

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

FILED  
MAY 15 2019  
CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY UAG DEPUTY CLERK

UNITED STATES OF AMERICA

v.

CRIM NO.

GAVIN FRIEDMAN

SA19CR0350 FB

INDICTMENT

The Grand Jury Charges:

Count One

Threat Against the President  
(Violation of 18 U.S.C. § 871(a))

On or about January 2, 2019, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, did knowingly and willfully deposit for conveyance in the mail and for a delivery from a post office and by a letter carrier a letter, paper, writing, print, missive, and document containing a threat to take the life of the President of the United States.

In violation of 18 U.S.C. § 871(a).

Count Two  
Mailing Threatening Communications  
(Violation of 18 U.S.C. § 876(c))

On or about January 2, 2019, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to the Office of the County Clerk, at 700 East Main Street, Kerrville, Texas 78028, and containing a threat to injure a United States judge, specifically, United States District Judge David Ezra of the Western District of Texas.

In violation of 18 U.S.C. § 876(c).

Count Three  
Mailing Threatening Communications  
(Violation of 18 U.S.C. § 876(c))

On or about January 2, 2019, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to the Office of the County Clerk, at 700 East Main Street, Kerrville, Texas 78028, and containing a threat to injure a federal law enforcement officer and an official who is covered by Title 18, U.S.C., Section 1114, specifically, the Director of the Federal Bureau of Investigation.

In violation of 18 U.S.C. § 876(c).

Count Four  
Mailing Threatening Communications  
(Violation of 18 U.S.C. § 876(c))

On or about January 2, 2019, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to the Office of the County Clerk, at 700 East Main Street, Kerrville, Texas 78028, and containing a threat to injure an official who is covered by Title 18, U.S.C., Section 1114, specifically, the Director of the Central Intelligence Agency.

In violation of 18 U.S.C. § 876(c).

Count Five  
Explosive Materials—Willfully Making a Threat  
(Violation of 18 U.S.C. § 844(e))

On or about January 2, 2019, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, through the use of the U.S. mail, in and affecting interstate commerce, willfully made a threat concerning an attempt being made and to be made to unlawfully damage and destroy real or personal property belonging to the U.S. Department of Defense, specifically, Fort Sam Houston, located in San Antonio, Texas, by means of an explosive.

In violation of 18 U.S.C. § 844(e).

Count Six  
Explosive Materials—Willfully Making a Threat  
(Violation of 18 U.S.C. § 844(e))

On or about January 2, 2019, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, through the use of the U.S. mail, in and affecting interstate commerce, willfully made a threat concerning an attempt being made and to be made to unlawfully damage and destroy real or personal property belonging to the government of the United States of America, specifically, the Federal Building in San Antonio, Texas, by means of an explosive.

In violation of 18 U.S.C. § 844(e).

Count Seven  
Explosive Materials—Willfully Making a Threat  
(Violation of 18 U.S.C. § 844(e))

On or about January 2, 2019, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, through the use of the U.S. mail, in and affecting interstate commerce, willfully made a threat concerning an attempt being made and to be made to unlawfully damage and destroy real or personal property belonging to the government of the United States of America, specifically, Lackland Air Force Base, located in San Antonio, Texas, by means of an explosive.

In violation of 18 U.S.C. § 844(e).

Count Eight  
Explosive Materials—Willfully Making a Threat  
(Violation of 18 U.S.C. § 844(e))

On or about January 2, 2019, in the San Antonio Division of the Western District of Texas, the defendant, **Gavin Friedman**, through the use of the U.S. mail, in and affecting interstate commerce, willfully made a threat concerning an attempt being made and to be made to unlawfully damage and destroy real or personal property belonging to the government of the United States of America, specifically, National Security Agency Headquarters, located at Fort Meade, Maryland, by means of an explosive.

In violation of 18 U.S.C. § 844(e).

A TRUE BILL

  
FOREPERSON

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UNITED STATES ATTORNEY GENERAL

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